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Attorneys for Defendants T.W.C. Construction, Inc. (TWC),
Travelers Casualty and Surety Company of America,
Matthew Ryba, AML Properties, Inc., AML Development 3, LLC,
and LaPour Partners, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

INTERIOR ELECTRIC INCORPORATED
NEVADA, a domestic corporation,

Plaintiff,

v.

T.W.C. CONSTRUCTION, INC., a Nevada
corporation; TRAVELERS CASUALTY
AND SURETY COMPANY OF
AMERICA, a Connecticut corporation;
MATTHEW RYBA, an individual;
GUSTAVO BAQUERIZO, an individual;
CLIFFORD ANDERSON, an individual;
POWER UP ELECTRIC COMPANY, a
Nevada limited liability company;
PROLOGIS, L.P., a Delaware limited
partnership; AML PROPERTIES, INC., a
Nevada corporation; AML
DEVELOPMENT 3, LLC, a Nevada
limited liability corporation; LAPOUR
PARTNERS, INC., a Nevada Corporation;
DON FISHER, an individual; PHILCOR
T.V. & ELECTRONIC LEASING, INC., a
Nevada corporation, dba NEDCO; QED,
INC., a Nevada corporation; TURTLE &
HUGHES, Inc., a New Jersey corporation;
DOES I-X, inclusive; and ROE
CORPORATIONS I-X, inclusive,

Defendants.

Case No. 2:18-CV-01118

**STIPULATION AND ORDER TO
EXTEND TIME TO REPLY IN
SUPPORT OF MOTION TO DISMISS**

(FIRST REQUEST)

[ECF No. 73]

1 Plaintiff Interior Electric Incorporated Nevada (“Plaintiff”), through the law firm of
2 Marquis Aurbach Coffing and the Law Offices of Philip A. Kantor, P.C., Defendants TWC
3 Construction, Inc., Travelers Casualty and Surety Company of America, Matthew Ryba, AML
4 Properties, Inc., AML Development 3, LLC, LaPour Partners, Inc., and Don Fisher, through the
5 law firm of Green Infuso, LLP, Defendant Turtle & Hughes, Inc., through the law firm of
6 Procopio, Cory, Hargreaves & Savitch, LLP, and Defendant Prologis, L.P., through the law firm
7 of McDonald Carano LLP (collectively referred to as “Defendants”), hereby stipulate and agree
8 as follows:

9 1. On August 30, 2018, Defendant Turtle & Hughes, Inc., filed a motion to dismiss
10 [ECF No. 50];

11 2. On August 31, 2018, Defendants TWC Construction, Inc., Travelers Casualty and
12 Surety Company of America, Matthew Ryba, AML Properties, Inc., AML Development 3, LLC,
13 LaPour Partners, Inc., and Don Fisher, filed a motion to dismiss [ECF No. 55];

14 3. On August 31, 2018, Defendant Prologis, L.P., filed a joinder [ECF No. 56] to
15 the motion to dismiss [ECF No. 55], separately setting forth dismissal arguments;

16 4. On September 7, 2018, Defendant Turtle & Hughes, Inc., filed a joinder [ECF No.
17 63] to the motion to dismiss [ECF No. 55];

18 5. Plaintiff entered a stipulation for an extension of time to respond to the motions to
19 dismiss [ECF Nos. 50 and 55] and the joinders thereto [ECF Nos. 56 and 63] (“Motions”);

20 6. On September 28, 2018, Plaintiff filed a response to the Motions;

21 7. This is the first stipulation for an extension of time for Defendants to reply in
22 support of the Motions;

23 8. The requested extension is needed due to an unexpected convergence of deadlines
24 for Defendants’ counsel Green Infuso, LLP, relating to multiple hearings, motions, oppositions
25 and reply briefs for various matters including, fees, costs, competing summary judgment
26 motions, three motions in limine, request for a new trial, motion to reconsideration, an extended
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meet and confer, and compilation of materials for a discovery demand; these were also impacted by doctor and dentist appointments for counsel and immediate family.

9. Accordingly, the parties stipulate and agree to extend the time for Defendants to reply in support of the Motions from October 5, 2018, to October 12, 2018.

10. This stipulation is not entered into for any improper purpose or to delay.

IT IS SO STIPULATED

DATED this 5th day of October, 2018.

DATED this 5th day of October, 2018.

GREENE INFUSO, LLP

MARQUIS AURBACH COFFING

/s/ Keith W. Barlow
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AML Properties, Inc., AML Development 3,
LLC, and LaPour Partners, Inc.*

Attorneys for Plaintiffs

DATED this 5th day of October, 2018.

DATED this 5th day of October, 2018.

**PROCOPIO, CORY, HARGREAVES & MCDONALD CARANO LLP
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Attorneys for Turtle & Hughes, Inc.

Attorneys for Prologis, L.P.

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IT IS SO ORDERED:

DATED: October 5, 2018